

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORCA SECURITY LTD.,)
Plaintiff,)
v.) C.A. No. 23-758 (JLH)
WIZ, INC.,)
Defendant.)

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Plaintiff Orca Security Ltd. and Defendant Wiz, Inc. respectfully move this Court to schedule a teleconference to address outstanding disputes regarding the following discovery matters.

Plaintiff Orca Security Ltd.'s Issues For Teleconference:

1. Defendants' deficient production of core technical documents, including the scope of source code to be produced.
2. Setting interim deadlines for Defendant's document productions and responses to Orca's interrogatories.¹

Defendant Wiz, Inc.'s Issues For Teleconference:

1. The timing of and conditions for Orca's production of source code for its allegedly practicing products.
2. Orca's failure to meet and confer on its Issue 2 above.

¹ Orca will show through the Parties' correspondence that this issue has been the subject of multiple meet and confers.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in one or more verbal meet-and-confers by telephone on the following dates: April 4, 2024, April 12, 2024, April 18, 2024, and April 23, 2024.

Delaware Counsel:

- Orca: Jack Blumenfeld and Rodger Smith (Morris, Nichols, Arsh & Tunnell);
- Wiz: Christine Haynes and Kelly Farnan (Richards, Layton & Finger)

Lead Counsel:

- Orca: Doug Lumish, Blake Davis, Krissy McKenna, Ryan Banks, and Lucas Lonergan (Latham & Watkins);
- Wiz: Jordan Jaffe, Caty Lacey, Callie Davidson, and Praatika Prasad (Wilson Sonsini)

The parties are available for a teleconference on the following dates: May 3, May 7, or May 8 after 1:00 pm ET.

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